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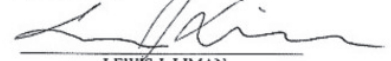
**REQUEST GRANTED.**

Parties are to be referred to the Magistrate Judge for Settlement purposes through separate order of the Court. The Court extends all remaining deadlines by 60 days. SEC Expert Disclosures are due by January 2, 2024. Defendant Expert Disclosures are due by January 30, 2024. Rebuttal Expert Reports are due by February 15, 2024. The deadline for Expert and All Discovery is March 19, 2024. Motions for Summary Judgment are due by April 2, 2024. Oppositions to Motions for Summary Judgment are due by May 1, 2024. Replies in Further Support of Motions for Summary Judgment are due by May 15, 2024. The joint pretrial order, motions in limine, requests to charge, and proposed voir dire is due by September 9, 2024. Oppositions to motions in limine and objections to proposed voir dire and requests to charge are due by September 16, 2024. The Final Pretrial Conference is rescheduled to October 2, 2024 at 2:00PM in Courtroom 15C at the 500 Pearl Street Courthouse. The Jury Trial is rescheduled to October 7, 2024 at 9:00AM in Courtroom 15C at the 500 Pearl Street Courthouse.

10/23/2023

October 20, 2023

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

**BY ECF**

Hon. Lewis J. Liman  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Securities and Exchange Commission v. Harmel S. Rayat, et al.*,  
No. 1:21 Civ. 4777 (LJL)

Dear Judge Liman:

We respectfully write together with defendant Jatinder Bhogal and relief defendant 1420527 Alberta Ltd. to request (1) a referral to the designated Magistrate Judge, the Honorable James L. Cott, for purposes of a settlement conference and (2) a 60-day stay to allow the parties to engage in settlement negotiations and conduct the conference with Judge Cott prior to continuing with expert discovery, summary judgment briefing, and trial. We have discussed these requests with the Securities and Exchange Commission, and the SEC consents to each of them.

**A. Request for Settlement Conference with Judge Cott**

With fact discovery having been completed, the remaining parties believe there is a good opportunity to explore a global resolution of the case. To facilitate settlement discussions, we respectfully ask for referral to Judge Cott. We believe that following the framework of Judge Cott's procedures and engaging in a conference with him will help ensure that the settlement negotiations are productive.

**B. Extension of Time**

To allow for the time and focus that will be required to make these settlement discussions productive, we respectfully request a 60-day stay of all current deadlines in the litigation. Pursuant to Section 3(A) of this Court's Individual Practices, good cause exists for this stay. Absent a stay, the parties would be in the position of simultaneously preparing for the settlement conference and engaging in resource- and time-intensive expert discovery and summary judgment practice. The need to proceed full speed with expert discovery and summary judgment

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briefing will hinder the parties' ability to engage in meaningful settlement discussions, as those discussions will require the majority of the parties' time and energy in order to be productive. A stay will additionally preserve the Court's resources by deferring the need to consider motions during the expert discovery phase as well as summary judgment motions that may prove unnecessary.

For these reasons, we ask that the Court grant a 60-day stay of the litigation, adjourn the current deadlines, as well as the trial date, *sine die*, and direct the parties to report back to the Court by no later than December 19, 2023, with a status report and, if necessary, a proposed revised case management plan and scheduling order.

Pursuant to Section 1(D) of the Court's Individual Practices, we list here the current deadlines in this case and other information related to prior extension requests:

1. *Existing Dates*

<b>Deadline</b>	<b>Current Date</b>
SEC Expert Disclosures	October 30, 2023
Defendant Expert Disclosures	November 30, 2023
Rebuttal Expert Reports	December 15, 2023
Close of Expert and All Discovery	January 19, 2024
Motions for Summary Judgment	February 2, 2024
Oppositions to Motions for Summary Judgment	March 1, 2024
Replies in Further Support of Motions for Summary Judgment	March 15, 2024
Joint Pre-Trial Order	June 7, 2024
Jury Trial	July 8, 2024

2. *Number of Previous Requests for Extension*

This is the eighth request for an extension of pre-trial deadlines, including the extension ordered after the SEC's motion to amend the Complaint was granted. This is the first request for an extension of the date set for jury trial, and the first request for an extension of time to allow the parties to engage in good-faith settlement negotiations.

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3. *Status of Previous Requests*

All previous requests for an extension of pre-trial deadlines have been granted.

4. *Consent of Other Parties*

The SEC consents to this request.

5. *The Parties' Next Scheduled Appearance*

The parties are next scheduled to appear before the Court for the jury trial scheduled for July 8, 2024.

Respectfully submitted,

/s/ Michael E. Donohue

Linda Imes

Max Nicholas

Michael E. Donohue

*Counsel for Defendants Harmel S. Rayat  
and RenovaCare, Inc.*